UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DALE and JENNIFER HARRIS, as Parents of RNH
Plaintiffs,

v.

Civil Action No.:

1:24-CV-12437-WGY

MARGARET ADAMS, KATHRYN ROBERTS, RICHARD SWANSON, NICOLE NOSEK, SUSAN PETRIE, ANDREW HOEY, KAREN SHAW, JOHN BUCKEY, and TOWN OF HINGHAM SCHOOL COMMITTEE
Defendants.

AFFIDAVIT OF BREE DUSSEAULT

I, Bree Dusseault, upon oath and personal knowledge, hereby depose and say:

1. I am currently the Principal and Managing Director at Center on Reinventing Public Education, where my work focuses on how public school systems, including districts and states, are driving innovation and sustainable change. My research specifically centers on the responses of these systems to the rise of AI-enabled learning, and how AI is reshaping the future of education.

2. In my previous role at CRPE, I led the center's national "rapid response" research examining the impact of COVID-19 on student learning experiences, community access to power, and longstanding systemic inequities in education. This research highlighted the significant challenges faced by underserved communities during the pandemic.

3. My research and insights have been featured in numerous prominent media outlets, including *The New York Times*, *The Washington Post*, *The Atlantic*, National Public Radio (NPR), and the BBC.

4. Before joining CRPE, I served as Executive Director of Green Dot Public Schools Washington. In this capacity, I was responsible for managing and leading a network of public charter schools dedicated to providing high-quality education to underserved communities.

5. I also held the position of Executive Director of pK-12 Schools for Seattle Public Schools, where I oversaw the operations and strategic direction of schools across the district. My role focused on improving educational outcomes and ensuring equitable access to quality education.

6. In addition to my administrative roles, I have extensive experience as a school principal and classroom teacher. These roles have given me firsthand knowledge of the day-to-day challenges faced by educators and students within public schools.

7. I am a member of the Aspen Global Leadership Network, which brings together leaders committed to addressing complex challenges in their respective fields. I am also a Pahara-Aspen Fellow, which emphasizes my commitment to leadership in educational reform and innovation.

8. I currently serve on the boards of Teach For America Washington and City Year South King County, where I help to guide these organizations in their missions to improve educational outcomes for students, particularly in underserved communities.

9. I was raised in Panama City, Florida, where I attended public schools. I later earned a Bachelor's degree in Economics from Dartmouth College, followed by a Master's degree in Education from the Harvard Graduate School of Education.

10. While at Harvard, I was a Reynolds Fellow for Social Entrepreneurship at the Kennedy School's Center for Public Leadership. This fellowship allowed me to develop leadership skills and explore innovative approaches to solving complex social issues.

11. AI adoption in schools has been uneven, and this has contributed to widening gaps in equity and access to educational resources. Despite concerns about AI misuse by students, fewer than 20% of teachers reported regularly using AI tools in the classroom last school year.

12. Of those teachers using AI, just over 10% reported utilizing tools that have been recommended by school leaders or their peers. This low level of adoption highlights the need for clearer guidance and support for schools in implementing AI technology.

13. The policy landscape for AI in education is currently fragmented. There is an urgent need for federal and state legislation to create a consistent framework that can guide AI adoption across schools and districts.

14. The federal government has thus far addressed AI through executive orders and limited guidance for schools, but this has been insufficient. Some states have developed their own AI-related policies, but these policies tend to lack specific details about implementation, contributing to further fragmentation.

15. Some state policies embrace the integration and use of AI and do not effectuate an outright ban on the use of AI, nor do these policies encourage districts to consider all uses of AI as cheating or plagiarism. Some policies provide Acceptable Use Scales to guide schools on when students may use AI in assignments.

16. There is no federal policy on the integration of AI in public schools issued by the United States Department of Education. The department's May 2023 policy report, *Artificial*

Intelligence and the Future of Teaching and Learning: Insights and Recommendations, addresses the clear need for sharing knowledge, engaging educators, and refining technology plans and policies for artificial intelligence (AI) use in education.

17. Similarly, the Massachusetts Department of Elementary and Secondary Education does not currently have any policies or guidelines proposed or adopted for AI integration in the public schools.

18. The U.S. Department of Education has committed to creating a resource bank for AI in education by fall 2024. However, many schools and districts need more immediate support as AI technology continues to advance rapidly.

19. Certain states, such as Florida, have already taken proactive steps to support AI adoption in schools. For example, Florida has allocated funding to develop and provide districts with AI professional development, coaching and resources.

20. Schools are hesitant to adopt AI technologies due to concerns over making mistakes and a general lack of understanding about how to effectively manage and integrate AI tools. This uncertainty has slowed the pace of AI adoption across many districts.

21. Historically, states have provided limited support for other technology trends in education, such as the internet and social media, leading to reactive implementation of these technologies. We risk a similar pattern emerging with AI, where many schools are left to navigate its complexities without adequate guidance.

22. To ensure successful AI adoption, states must offer more than just policy guidelines. They should set clear benchmarks for school systems to meet, hold districts accountable, and provide flexibility for creative implementation, along with necessary funding and support.

23. The education sector must develop a more coordinated approach to driving AI adoption in schools. This requires collaboration among district leaders, educators, edtech providers, parents, and civil rights organizations to ensure that AI solutions are effective and equitable.

24. Data sharing between districts and edtech providers is critical to developing AI tools that improve teaching and learning. However, such data sharing must be accompanied by strong privacy protections for student data to ensure safety and compliance with legal standards.

25. AI literacy is essential for educators, students and families to ensure that the technology is used effectively and equitably. This literacy must include an understanding of how AI works, its limitations, and its potential to reshape the educational landscape.

26. Leadership at all levels is critical to navigating the challenges posed by AI. Educators, policymakers, business leaders, and community members must work together to build

public trust in AI and ensure that the technology is implemented in ways that benefit all students.

27. Transparent communication and stakeholder engagement are necessary to build public understanding of AI's role in education. This will help to prevent resistance to long-term changes and ensure that school districts keep pace with private schools, microschools, charter schools, and other more agile players in the education space.

Signed under the pains and penalties this __18th__ day of October, 2024..

Bree Dusseault